

Sub B27

27 (New). A project management system for managing operations of an enterprise, said system comprising:

a centralized server computer, said server computer being configured to execute a project manager disposed to (a) create projects for said enterprise, (b) define one or more organizational entities within the enterprise, (c) define one or more user groups associated with each of the organizational entities, and (d) define one or more users associated with each of the user groups; and

at least one user computer configured to log on to said centralized server computer and access said project manager.

Sub D9
A4

28 (New). The project management system of claim 27 further including one or more supplier computers coupled to said centralized server computer.

29 (New). The project management system of claim 27 wherein said project manager further operates to define user roles associated with at least one of the users.

30 (New). The project management system of claim 27 wherein said at least one user computer and said centralized server computer are operatively connected via a distributed communications network, said at least one computer executing a web browser capable of interfacing with said project manager.

REMARKS

Subject to the Examiner's entry of the amendments herein, claims 1-30 are pending in the application. By this Amendment Applicant has amended claims 1-3, 5 and 8-19, and has added new claims 27-30, in order to further define the present invention. Attached hereto is a marked-up version of the changes made to the claims by the current Amendment. The attached page is captioned "VERSION WITH MARKINGS TO SHOW CHANGES MADE."

In the above Office Action, the Examiner has rejected claims 1-26 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,161,146 issued to Kley et al. ("Kley") in view of U.S. Patent No. 5,694,551 issued to Doyle et al ("Doyle"). The Examiner's

characterization of Kley and Doyle made in support of the outstanding rejection of claim 1 is set forth below:

Kley renders obvious independent claim 1 by the following:
“logging on to a project manager server,...” at col. 2 lines 20-43;
“...,one or more organizational,...” at col. 2 lines 1-32;
“..., one or more user groups,...” at col. 1 lines 7-17;
“defining one or more users associated,...” at col. 1 lines 7-17;
“..., associated with at least,...” at col. 1 lines 7-17.

Kley does not explicitly teach defining from the user in an enterprise, but Doyle does teach the user define like as enterprise of data processing for handling the ordering, order tracking and accounting of suppliers at col. 3 lines 24 to col. 6 lines 17.

Thus it would have been obvious to one ordinarily skilled in the art at the time the invention was made to provide “the user define of data processing” of Doyle to “group activity network systems” of Kley in order to have means of user define to a processing system at col. 3 lines 24 to col. 6 lines 17, Abstract, Doyle.

Applicant respectfully observes that the cited portions of Kley fail to describe or suggest a method for managing enterprise operations in accordance with the invention. In general, Kley describes a group activity data network system which is configured in the exemplary embodiment as a version control system (VCS). As such, the Kley system is wholly inapposite to the method of enterprise management of the present invention.

Turning to the first element of claim 1, the Examiner alleges that the recitation of *logging on to a project manager server from a computer network* is described by Kley at col. 2, lines 20-43. However, Kley does not appear to describe or suggest a log-on process within the cited passage. The user log-on process of the present invention facilitates establishment of, for example, a user's identity, access rights and permissions (see, e.g., the specification at page 6, lines 5-9 and at page 57), and to the best of Applicant's knowledge such is not described or suggested by Kley.

Turning to the next element of claim 1, the Examiner indicates that the recitation of *defining one or more organizational entities within the enterprise* is described by Kley at col. 2, lines 20-43. Applicant observes that neither the cited passage nor any other portion of Kley describes defining one or more organizational entities. Although Kley mentions the term “organization” at col. 2, line 1, this is made with reference to a conventional group activity system discussed in the “BACKGROUND” section of Kley and in no way suggests definition of one or more organizational entities. In contrast, in a particular embodiment of the invention a system user is permitted to specify various attributes of an applicable organizational entity (e.g.,

address, phone number) subsequent to successful completion of a log-on process. See, e.g., the present specification at page 34, lines 17-27 and page 49, lines 12-24.

The Examiner also indicates that Kley describes *defining one or more user groups associated with each of the organizational entities* at col. 1, lines 7-17. This aspect of the present invention is summarized in the present specification as follows:

User Groups

This feature enables one to create User Groups for the company. A User Group, as the name implies, is a group of users that are associated in some way. For instance, you may create a User Group for Marketing and one for Purchasing. Users can assign users to more than one group at a time. The User Groups will be used in the Permissions feature.

[48:9-13]

Because the Kley system is not directed to enterprise management, Kley fails to describe or suggest any analogous mechanism for defining user groups. In particular, the cited portion of Kley (i.e., col. 1, lines 7-17) does not appear to suggest the definition of user groups, and instead merely describes certain aspects of Kley's architecture for facilitating access to shared data files.

With regard to the next element of claim 1, the Examiner indicates that the recitation of *defining one or more users associated with each of the user groups* is described at col. 1, lines 7-17. However, as discussed above, the cited excerpt from Kley does not describe the formation of user groups, and thus cannot describe or suggest the association of users with such user groups:

The present invention relates generally to group activity (GA) network systems and corresponding methods that control, synchronize, and provide access by system users to the shared data files of a group activity (i.e., project, task, plan, etc.). In particular, it pertains to a distributed group activity network system and corresponding method where individual system modules are run on client computers and utilize the basic network services available at one or more server computers that store the shared data files of the group activity so as to control, synchronize, and provide access to the shared data files and to distribute these shared data files to the client computers for storage.

[Kley, col. 1, lines 7-17]

Considering the final element of claim 1, the Examiner has alleged that the recitation of *defining user roles associated with at least one of the users* is described at col. 1, lines 7-17. However, review of this excerpt from Kley (set forth above) indicates that the Kley system fails to contemplate the definition of *user roles*. In contrast, the present specification describes such definition of user roles as follows:

Define User Roles

Once a user is enabled, the Key User may need to assign the users' administrative privileges for different areas of the system. The User Roles are primarily management level roles that involve *approving* the spending of money or the actual spending of money. Not every user in your company will have this authority. It's not necessary to assign a User Role to give users standard access to the system. Once you've enabled them, they automatically have standard access.

User Roles are assigned as follows:

- ❖ Log in to the home page o the provider of the present invention (SourceFinder in the example screen shots provided herein).
- ❖ Select Key User Interface button
- ❖ Select "User Roles" from the menu
- ❖ Locate the user's name in the left-hand column and indicate which function each user will be given access to by checking the appropriate boxes by that person's name.

[46:13-27]

In the above Office Action the Examiner acknowledges that Kley does not teach certain aspects of the pending claims, but it is unclear as to which portion of the claims the Examiner is indicating that Kley is inapplicable. In particular, the Examiner states:

Kley does not explicitly teach defining from the user in an enterprise, but Doyle does teach the user define like as enterprise of data processing for handling the ordering, order tracking and accounting of suppliers at col. 3 lines 24 to col. 6 lines 17.

Thus it would have been obvious to one ordinarily skilled in the art at the time the invention was made to provide the "user define of data processing" of Doyle to "group activity network systems" of Kley in order to have means of user define to a processing system at col. 3 lines 24 to col. 6 lines 17, Abstract Doyle.

Specifically, Applicant notes that the recitation apparently not taught by Kley (i.e., "defining from the user in an enterprise") does not appear in claim 1. Moreover, the recitation allegedly taught by Doyle (i.e., "the user define like as enterprise of data processing") does not appear in claim 1 and is not understood by Applicant. Finally, the Examiner has not demonstrated how the allegedly obvious combination of the "user define of data processing" of Doyle to "group activity network systems" of Kley yields any of the elements of claim 1. Rather, the Examiner has asserted that this combination results in a "means of user define to a processing system" which is not recited in claim 1 and is not understood by Applicant. Clarification is respectfully requested.

Applicant also observes that the Examiner has not demonstrated any motivation within the prior art suggesting that systems such as Kley and Doyle could be combined in order to yield

the present invention. In this regard Applicant notes that Kley is directed to a distributed group activity data network and Doyle relates to an electronic requisitioning system for channeling customer requisition orders. As such, the systems of Kley and Doyle are within wholly different fields of endeavor and a tenable basis for their combination has not been demonstrated.

Finally, Applicant has reviewed the cited portions of Doyle and has found no indication that Doyle even describes the portions of the claimed subject matter indicated to not have been described by Kley. For example, Doyle does not appear to describe or suggest the definition of user groups, the definition of users associated with such groups, or the definition of user roles. Accordingly, Applicant respectfully submits that Doyle fails to remedy any of Kley's deficiencies with regard to the subject matter of the pending claims.

Considering now the Examiner's rejection of claim 19, the Examiner states that:

Kley renders obvious independent claim 19 by the following:
"a project manager for creating a project,..." at col. 5 liens 23-67;
"one or more internal,..." at col. 6 liens 23-67, Abstract; and
"..., said project manager at col. 5 lines 23-67, col. 1 lines 7-18.

Kley does not explicitly teach the one or more suppliers in an enterprise, but Doyle does teach the suppliers like as enterprise of data processing for handling the ordering, order tracking and accounting of suppliers at col. 3 lines 8-40, Abstract, Doyle.

Thus it would have been obvious to one ordinarily skilled in the art at the time of the invention was made to provide "the suppliers of data processing for handling the order" of Doyle to "group activity network systems" of Kley in order to have means of supplier processing to the system at col. 3 lines 8-40, Abstract, Doyle.

For the reasons discussed above, Applicant respectfully submits that Kley and Doyle are concerned with separate fields of endeavor and as such their combination would be inappropriate. Moreover, Applicant respectfully submits the Examiner has not demonstrated the manner in which the systems of Kley and Doyle could be combined to yield the invention of claim 19 even if such combination were appropriate. Specifically, Applicant fails to appreciate the manner in which "the suppliers of data processing for handling the order" of Doyle in combination with the "group activity network systems" of Kley yield the invention of claim 19. For example, the Examiner's statement that Doyle teaches "the suppliers like as enterprise of data processing for handling" appears to have no relationship to claim 19, with the exception of the mere mentioning of the word "suppliers". Moreover, even accepting arguendo that Doyle suggests that suppliers could be coupled to a project manager as presently claimed, the cited portion of Kley (i.e., col. 5 lines 23-67, Abstract) does not describe the coupling of one or more

internal departments of an enterprise to a project manager as suggested by the Examiner. Rather, these excerpts appear to simply describe the control of access to shared data files by individual system users, which is inapposite to the teachings of claim 19.

Notwithstanding the clear distinctions between claim 19 and the systems of Kley and Doyle, claim 19 has been amended to more particularly highlight the structure of the inventive project manager. In particular, claim 19 now recites that each of the projects created by the project manager are defined by a project management tree containing a plurality of data objects disposed to cooperatively effect a project management function. Since neither Kley nor Doyle are directed to project management systems, it follows that neither Kley nor Doyle suggest this type of structure.

Applicant has also added new apparatus claims 27-30, which include recitations directed to various aspects of the inventive project management system discussed above.

Accordingly, it is respectfully submitted that independent claims 1, 19 and 27 define subject matter patentable in view of Kley and/or Doyle. Since all of the other pending claims directly or indirectly depend from these independent claims, it also respectfully submitted that all such dependent claims are patentable in view of the cited references.

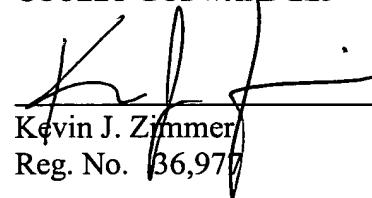
Applicant respectfully requests entry of these amendments prior to further examination of the above-identified application. The undersigned would of course be available to discuss the present application with the Examiner if, in the opinion of the Examiner, such a discussion could lead to resolution of any outstanding issues.

Dated: August 26, 2002

Cooley Godward LLP
ATTN: Patent Group
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Tel: (650) 843-5000
Fax: (650) 857-0663

By:

Respectfully submitted,
COOLEY GODWARD LLP



Kevin J. Zimmer
Reg. No. 36,971

VERSION WITH MARKINGS TO SHOW CHANGES MADE**In the Claims**

1 (Amended). A method for managing enterprise operations comprising[the steps of]:
logging on to a project manager server from a computer network;
defining one or more organizational entities within the enterprise;
defining one or more user groups associated with each of the organizational entities;
defining one or more users associated with each of the user groups; and
defining user roles associated with at least one of the users.

2 (Amended). The method of claim 1, further comprising [the step of]defining one or more external agencies for interfacing with the project management server.

3 (Amended). The method of claim 1, further comprising [the step of]defining one or more suppliers for interfacing with the project management server.

5 (Amended). The method of claim 1, further comprising[the steps of]:
remotely logging on to the project manager server from a terminal coupled with a computer network; and
creating a project associated with one of the organizational entities.

8 (Amended). The method of claim 6, wherein said method further comprises[the steps of]:
providing a user identifier to the project management server from a remote location;
receiving a customized home page in accordance with the user identifier, wherein the customized home page includes one or more projects associated with the user in accordance with the user roles; and
interfacing with the project by viewing objects within the project tree in accordance with the user roles.

9 (Amended). The method of claim 6, further comprises[the steps of]:

interfacing with said project by editing one or more objects within the project tree in accordance with the user roles.

10 (Amended). The method of claim 6, further comprising[comprises the steps of]:

interfacing with the project by deleing one or more objects within the project tree in accordance with the user roles.

11 (Amended). The method of claim 6, wherein said method further comprises[the steps of]:

interfacing with the project by adding one or more objects within said project tree in accordance with the user roles.

12 (Amended). The method of claim 3, further comprising [the step of]completing a user defined spec for specifying a product of service.

13 (Amended). The method of claim 12, further comprising [the step of]generating an RFQ from the completed user-defined spec.

14 (Amended). The method of claim 13, further comprising [the step of]sending one or more RFQ's to suppliers that match the completed spec.

15 (Amended). The method of claim 14, further comprising [the step of]receiving one or more bids from suppliers in response to the RFQs.

16 (Amended). The method of claim 15, further comprising [the steps of]awarding the job to one or more of said suppliers that sent in a bid.

17 (Amended). The method of claim 16, further comprising [the step of]automatically generating purchase orders associated with awarded jobs.

18 (Amended). The method of claim 8, wherein said method further comprises[the steps of]:

interfacing with said project by adding one or more objects to said customized home page.

19 (Amended). A centralized system for managing enterprise operations comprising:

a project manager for creating projects for the enterprise, each of said projects being defined by a project management tree containing a plurality of data objects disposed to cooperatively effect a project management function;

one or more internal departments of the enterprise coupled to said project manager; and one or more suppliers coupled to said project manager.

27 (New). A project management system for managing operations of an enterprise, said system comprising:

a centralized server computer, said server computer being configured to execute a project manager disposed to (a) create projects for said enterprise, (b) define one or more organizational entities within the enterprise, (c) define one or more user groups associated with each of the organizational entities, and (d) define one or more users associated with each of the user groups; and

at least one user computer configured to log on to said centralized server computer and access said project manager.

28 (New). The project management system of claim 27 further including one or more supplier computers coupled to said centralized server computer.

29 (New). The project management system of claim 27 wherein said project manager further operates to define user roles associated with at least one of the users.

30 (New). The project management system of claim 27 wherein said at least one user computer and said centralized server computer are operatively connected via a distributed communications network, said at least one computer executing a web browser capable of interfacing with said project manager.